

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) **Bankruptcy No. 15-22899-GLT**
Eve F Beahm,) **Chapter 13**
Debtors,)
PNC Bank, N.A.,) **Related to Claim No. 5**
Movant,)
vs.) **Document No.**
Eve F Beahm)
and Ronda J. Winnecour)
Respondents.)

DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT

AND NOW, comes the Debtor, Eve Beahm, by and through her attorneys, CALAIARO VALENCIK and David Z. Valencik, and presents the following:

1. This case was originally filed on February 26, 2015.
2. On November 10, 2016, the Debtor received a notice of mortgage payment change from PNC Bank, N.A.
3. The Court issued an Order on November 10, 2016 directing the Debtors to file, either:
 - (1) an AMENDED CHAPTER 13 PLAN;
 - (2) a DECLARATION that the existing Chapter 13 Plan is sufficient to fund the Plan with the modified debt; or
 - (3) an OBJECTION to the Notice of Mortgage Payment Change as stated,
4. The Debtors existing plan is paying \$644.06 monthly to this Mortgage Holder. The notice of mortgage payment change states that the new total payment is to be \$615.02.

5. The current plan is sufficient at this time to fund this change, so there is no reason to amend the plan.

Respectfully submitted,

DATED: December 1, 2016

BY: /s/ David Z. Valencik
David Z. Valencik, Esquire, PA I.D. #308361
dvalencik@c-vlaw.com
CALAIARO VALENCIK
428 Forbes Ave., Suite 900
Pittsburgh, PA 15219-1621
(412) 232-0930

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Eve F. Beahm,

Debtors,

PNC Bank, N.A.,

Movant,

vs.

Eve F. Beahm

and Ronda J. Winnecour

Respondents.

) **Bankruptcy No. 15-22899-GLT**

) **Chapter 13**

)

) **Related to Claim No. 5**

)

) **Document No.**

)

)

)

CERTIFICATE OF SERVICE OF Declaration that the Existing Chapter 13 Plan is Sufficient

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on December 1, 2016.

Service by NEF:

Vicki Pringle, Phelan PNC Mortgage, Default Support Specialist, 3232 Newmark Drive, Miamisburg, OH 45342; bankruptcy@pncmortgage.com

Office of the U.S. Trustee, 1001 Liberty Avenue, Suite #970, Liberty Center, Pittsburgh, PA 15222

Ronda J. Winnecour, Chapter 13 Trustee receives service electronically through the CM/ECF System at cmecl@chapter13trustee.wpa.com

Service by First Class Mail:

Eve F. Beahm; 135 Lebeouf Drive, New Kensington, PA 15068

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: Notice of Electronic Filing and First-Class Mail.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: December 1, 2016

/s/ David Z. Valencik

David Z. Valencik, Esquire, PA I.D. #308361

dvalencik@c-vlaw.com

CALAIARO VALENCIK

428 Forbes Ave., Suite 900

Pittsburgh, PA 15219-1621

(412) 232-0930